## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CYPRESS HOLDINGS, III, L.P., individually and derivatively on behalf of SPORT-BLX, INC.,

Plaintiff,

v.

GEORGE HALL, JOSEPH DE PERIO, DANIEL STRAUSS, FRANCIS RUCHALSKI, CESAR BAEZ, CHRISTOPHER JOHNSON, SPORT-BLX, INC., SPORT-BLX SECURITIES, INC., CLINTON GROUP INC., and GLASSBRIDGE ENTERPRISES, INC.,

Defendants.

Civil Action No. 1:22-cv-1243-LGS

**Related case:** 

Civil Action No. 1:22-cv-8111-LGS

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that upon the Declaration of Alexander M. Dudelson, dated January 6, 2025, and exhibits annexed thereto; the accompanying Memorandum of Law dated January 6, 2024; Plaintiff's Response to Defendants' Statement of Undisputed Facts pursuant to Local Rule 56.1; and all pleadings and proceedings previously had herein, Plaintiff Cypress Holdings III, L.P. will move before the Honorable Lorna G. Schofield, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York at a date and time to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure: (i) denying Defendants' Motion in its entirety and (ii) dismissal of all claims asserted by Sport-BLX, Inc. in the related Action No. 1:22-cv-8111.

Dated: Brooklyn, New York January 6, 2025

/s/Alexander M. Dudelson
ALEXANDER M. DUDELSON, ESQ.
26 Court Street – Suite 2306
Brooklyn, New York 11242
(718) 855-5100
(718) 624-9552 FAX
Attorneys for Plaintiff